

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

*Plaintiff-Intervenor,*

v.

STEWARD HEALTH CARE SYSTEM  
LLC; STEWARD MEDICAL GROUP,  
INC.; and STEWARD ST. ELIZABETH'S  
MEDICAL CENTER OF BOSTON, INC.,

*Defendants.*

Case No. 18-cv-11160-WGY

**ORAL ARGUMENT REQUESTED**

**DEFENDANTS' MOTION TO DISMISS THE UNITED STATES'**  
**COMPLAINT-IN-INTERVENTION**

Defendants Steward Health Care System LLC, Steward Medical Group, Inc., and Steward Saint Elizabeth's Medical Center of Boston, Inc. (collectively "Defendants") hereby move to dismiss the United States' Complaint-In-Intervention (Dkt. 52) in its entirety for failure to state a claim pursuant to Fed. R. Civ. P. 12(b)(6).

**REQUEST FOR ORAL ARGUMENT**

Defendants respectfully request oral argument on their motion to dismiss.

Dated: April 8, 2024

Respectfully submitted,

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SULLIVAN, LLP

*/s/ William D. Weinreb*

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Care System LLC; Steward Medical Group,  
Inc.; and Steward St. Elizabeth's Medical  
Center of Boston, Inc.*

**LOCAL RULE 7.1(A)(2) CERTIFICATION**

I hereby certify that undersigned counsel conferred with the government in an attempt to resolve or narrow the issues raised by this motion. The government opposes this motion.

Dated: April 8, 2024

*/s/ William D. Weinreb*

William D. Weinreb

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was filed on April 8, 2024, through the ECF System and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: April 8, 2024

*/s/ William D. Weinreb*  
William D. Weinreb